

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THE OFFICIAL STANFORD INVESTORS
COMMITTEE and RALPH S. JANVEY, IN HIS
CAPACITY AS COURT-APPOINTED RECEIVER
FOR THE STANFORD INTERNATIONAL BANK,
LTD., ET AL.,

Plaintiffs,

v.

AMERICAN LEBANESE SYRIAN ASSOCIATED
CHARITIES, INC., ST. JUDE CHILDREN'S
RESEARCH HOSPITAL/ALSAC, ST. JUDE
CHILDREN'S RESEARCH HOSPITAL and LE
BONHEUR CHILDREN'S MEDICAL CENTER
FOUNDATION,

Defendants.

Case No. 3:11-cv-00303

MOTION TO DISMISS CLAIMS WITH PREJUDICE

The plaintiffs and the defendant, Le Bonheur Children's Medical Center Foundation, now known as Le Bonheur Children's Hospital Foundation, move for dismissal with prejudice of all claims brought by the plaintiffs against the this defendant, and for grounds, assert the following:

1. The parties, through mediation, have agreed to resolve all pending claims and all claims that could have been brought by or on behalf of the plaintiffs against this defendant for an agreed upon settlement as per the terms of a Settlement Agreement and Release instrument entered into by the parties;

2. The parties agreed that, following payment of the settlement amount as described in the Agreement, they would execute and file an agreed upon Motion to Dismiss the present lawsuit, with each party bearing its own costs and fees, discretionary and non-discretionary;

3. The parties acknowledge that the consideration set forth in the Agreement has been paid and that the case is, therefore, properly subject to the present Motion to Dismiss as to the Le Bonheur Defendant.

For these reasons, the parties jointly move for an Order dismissing the above-referenced case with prejudice as to Defendant, Le Bonheur Children's Hospital Foundation f/k/a Le Bonheur Children's Medical Center Foundation.

By its attorneys:

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By: s/Jacob A. Dickerson
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By: s/Matthew W. Sparks
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CERTIFICATE OF SERVICE

This is to certify that on April 21, 2016, a true and correct copy of the foregoing document has been served on all counsel of record through this Court's ECF system in accordance with Rule 5 of the Federal Rules of Civil Procedure and/or N.D. Texas Miscellaneous Order No. 61 (service on counsel who have consented to electronic service).

s/Judith R. Blakeway
JUDITH R. BLAKEWAY